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10 Attorneys for Nominal Defendant
11 Power Integrations, Inc.

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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Kimberly Quaco, Derivatively on Behalf of
Nominal Defendant POWER
INTEGRATIONS, INC.,

Case No. C-06-2811-MHP

Plaintiff,
v.
Balu Balakrishnan, *et al.*,
Defendants,
Power Integrations, Inc.,
Nominal Defendant.

**STIPULATION ESTABLISHING A SERVICE
DATE AND EXTENDING TIME FOR
DEFENDANTS' RESPONSE TO THE
AMENDED COMPLAINT**

Pursuant to Civil Local Rule 6-1, the parties submit the following Stipulation Establishing a Service Date and Extending Time for Defendants' Response to Plaintiff's Amended Complaint.

WHEREAS, plaintiff Kimberly Quaco filed the original complaint in this action on April 25, 2006, naming nominal defendant Power Integrations, Inc. and defendants Balu Balakrishnan, Alan D. Bickell, R. Scott Brown, Howard F. Earhart, E. Floyd Kvamme, and Clifford J. Walker ("Original Individual Defendants");

WHEREAS, the parties stipulated on May 10, 2006, to allow plaintiff to file an amended complaint;

1 WHEREAS, on May 26, 2006 plaintiff filed the Amended Complaint;

2 WHEREAS, the Amended Complaint added ten new parties: Derek Bell, Nicholas E.
3 Brathwaite, John M. Cobb, Roderick D. Davies, Balakrishnan S. Iyer, Bruce Renouard, Vladimir
4 Rumennik, Daniel M. Selleck, Robert G. Staples, and John Tomlin ("New Individual
5 Defendants");

6 WHEREAS, plaintiff has not yet served the Amended Complaint on all of the New
7 Individual Defendants;

8 WHEREAS, the Original Individual Defendants are no longer represented by the same
9 counsel as nominal defendant Power Integrations, Inc.;

10 WHEREAS, new counsel for the Original Individual Defendants has only recently been
11 retained;

12 WHEREAS, the parties agree it would be most efficient for the Court and the parties for
13 there to be a single date established by which defendants shall respond to the Amended
14 Complaint;

15 WHEREAS, the establishment of a single date by which all defendants must respond to
16 the Amended Complaint will help avoid piecemeal litigation;

17 WHEREAS, the schedule contemplated by this Stipulation will allow new counsel for the
18 individual defendants to prepare adequately;

19 WHEREAS, the only date or deadlines set by Court order are the Joint Case Management
20 Statement due September 1, 2006 and the Case Management Conference set for September 11,
21 2006; and

22 WHEREAS, this stipulation will not effect the deadline for the filing of the Joint Case
23 Management Statement or the date of the Case Management Conference;

24 NOW THEREFORE, IT IS HEREBY STIPULATED, by and between the undersigned, as
25 follows:

26 1. Counsel for the New Individual Defendants will accept service on behalf of their
27 clients without thereby waiving any objection to venue or jurisdiction;

28 2. The Amended Complaint shall be deemed served on all parties as of August 14,

1 2006;

2 **3.** Defendants shall respond to plaintiff's Amended Complaint on or before
3 September 12, 2006.

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7 Dated: June 21, 2006

BORNSTEIN & BORNSTEIN

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/S/ (With express authorization)
Jonathan Herschel Bornstein

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Attorneys for Plaintiff

Filer's Attestation: Pursuant to General Order No. 45, Section X(B) regarding signatures, Jeffrey M. Kaban hereby attests that concurrence in the filing of this document has been obtained

Dated: June 21, 2006

COOLEY GODWARD LLP

/S/
John C. Dwyer
Jeffrey M. Kaban

Attorneys for Nominal Defendant
Power Integrations, Inc.

1 Dated: June 21, 2006

LATHAM & WATKINS LLP

3 /S/ (With express authorization)

4 Jay L. Pomerantz

5 Peter A. Wald

6 Attorneys for Defendants

7 Balu Balakrishnan, Alan D. Bickell, Nicholas E.
8 Brathwaite, R. Scott Brown, Balakrishnan S. Iyer,
9 and E. Floyd Kvamme

10
11 *Filer's Attestation: Pursuant to General Order
12 No. 45, Section X(B) regarding signatures, Jeffrey
13 M. Kaban hereby attests that concurrence in the
14 filing of this document has been obtained*

15 Dated: June 21, 2006

16 HELLER EHRLMAN LLP

17 /S/ (With express authorization)

18 Norman J. Blears

19 Michael L. Charlson

20 Attorneys for Defendants

21 Derek Bell, Roderick D. Davies, Bruce Renouard
22 Vladimir Rumennik, Daniel M. Selleck,
23 John Tomlin and Clifford J. Walker

24 *Filer's Attestation: Pursuant to General Order
25 No. 45, Section X(B) regarding signatures, Jeffrey
26 M. Kaban hereby attests that concurrence in the
27 filing of this document has been obtained*

28 Dated: June 21, 2006

TOWNSEND AND TOWNSEND AND CREW LLP

22 /S/ (With express authorization)

23 Leigh A. Kirmsse

24 Attorneys for Defendant

25 John M. Cobb

1 Dated: June 21, 2006

MORRISON & FOERSTER

2

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/S/ (With express authorization)

Jordan Eth

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Attorneys for Defendant
Robert G. Staples

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*Filer's Attestation: Pursuant to General Order
No. 45, Section X(B) regarding signatures, Jeffrey
M. Kaban hereby attests that concurrence in the
filing of this document has been obtained*

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Dated: June 21, 2006

FENWICK & WEST LLP

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/S/ (With express authorization)

Emmett C. Stanton

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Attorneys for Defendant
Howard F. Earhart

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June 22, 2006



1 **PROOF OF SERVICE**
 2 **(FRCP 5)**

3 I am a citizen of the United States and a resident of the State of California, over the age
 4 of 18 years, and not a party to the within action. I am employed in Santa Clara County, State of
 5 California, in the office of a member of the bar of this Court, at whose direction the service was
 6 made. My business address is Cooley Godward LLP, Five Palo Alto Square, 3000 El Camino
 7 Real, Palo Alto, CA 94306-2155. On June 21, 2006, I served the following documents on the
 8 parties listed below in the manner(s) indicated:

9 **STIPULATION ESTABLISHING A SERVICE DATE AND EXTENDING TIME FOR DEFENDANTS'**
 10 **RESPONSE TO THE AMENDED COMPLAINT**

- 11 (BY U.S. MAIL) I am personally and readily familiar with the business practice
 of Cooley Godward LLP for collection and processing of correspondence for
 mailing with the United States Postal Service, and I caused such envelope(s), with
 postage fully prepaid, to be deposited with the U.S. Postal Service.
- 13 (BY MESSENGER SERVICE) I consigned the document(s) to an authorized
 courier and/or process server for hand delivery on this date.
- 15 (BY FACSIMILE) I am personally and readily familiar with the business practice
 of this firm for collection and processing of documents to be transmitted by fax
 and I caused such document(s) on this date to be faxed to the offices of
 addressee(s) at the numbers listed below.
- 17 (BY OVERNIGHT MAIL) I am personally and readily familiar with the business
 practice of this firm for collection and processing of correspondence for overnight
 delivery, and I caused such document(s) to be deposited with a facility regularly
 maintained by FedEx for overnight delivery.
- 19 (BY ELECTRONIC MAIL) I am personally and readily familiar with the
 business practice of this firm for the preparation and processing of documents in
 portable document format (PDF) for e-mailing, and I prepared said documents in
 PDF and then served them by e-mailing them to the following internet addresses.

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21
22 Emmett C. Stanton, Esq.
I declare under penalty of perjury that the foregoing is true and correct. Executed on
23 June 21, 2006, at Palo Alto, California.

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25 /s/
26 _____
Jeffrey M. Kaban
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